

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CRIMINAL NO. SA-18-CR-00013-XR
)	
PAUL CASEY WHIPPLE,)	
)	
Defendant.)	

UNITED STATES OF AMERICA'S
BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, and files the following Bill of Particulars for Forfeiture of Property.

On January 10, 2018, an Indictment (Doc. 11) was returned against Defendant **PAUL CASEY WHIPPLE** for the violations of Title 18 U.S.C. §§ 2251(a), 2252A(a)(2) and (A)(a)(5)(B). The Indictment included a Notice of United States of America's Demand for Forfeiture which gave notice that the United States seeks the criminal forfeiture of property pursuant to Title 18 U.S.C. §§ 2253(a)(1), (2), and (3). Specifically, this Bill of Particulars seeks the criminal forfeiture of the property listed herein.

The United States hereby gives notice that it seeks the criminal forfeiture of certain property from Defendant **PAUL CASEY WHIPPLE** as follows:

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

Sexual Exploitation Violations and Forfeiture Statutes

**[Title 18 U.S.C. §§ 2251(a) 2252A(a)(2) and 2252A(a)(5)(B),
subject to forfeiture pursuant to Title 18 U.S.C. §§ 2253(a)(1), (2), and (3)]**

As a result of the foregoing criminal violations set forth in Counts One through Ten, the United States of America gives notice to Defendant **PAUL CASEY WHIPPLE**, of its intent to seek the forfeiture of any forfeitable properties upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(1), (2), and (3), which states:

Title 18 U.S.C. § 2253. Criminal forfeiture

(a) Property subject to criminal forfeiture.-A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter, of who is convicted of an offense under section 2252B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person's interest in-

- (1)** any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2)** any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3)** any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

This Bill of Particulars includes but is not limited to the properties described below.

Personal Properties

1. Apple IPOD- S/N CCQP70TLG22W
2. Ivation Shockproof 20 meg pixel camera, S/N K160017012648401212 with 32 GB Ultra Micro SD card
3. Zetta camera with 64GB micro scan disk ultra card
4. Zetta camera with 64 GB micro SD card with USB cable
5. WD 1TB hard drive S/N WCC3F5TV1R2Z; and
6. Lenovo 90GA Desktop computer S/N R304BA7Z with power cord.

Respectfully submitted,

JOHN F. BASH
United States Attorney

By: /s/
ANTONIO FRANCO, JR.
Assistant United States Attorney
Asset Forfeiture Section
601 N.W. Loop 410, Suite 600
San Antonio, Texas 78216
Tel: (210) 384-7040
Fax: (210) 384-7045
Texas Bar No. 00784077

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2020, the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to the following CM/ECF participant:

Angela Saad Lindsey
Office of the Federal Public Defender
727 E.Cesar E. Chavez Blvd., Suite B-207
San Antonio, Texas 78206
(210) 472-6700
Email: angela_saad@fd.org
Attorney for Defendant PAUL CASEY WHIPPLE

/s/ _____
ANTONIO FRANCO, JR.
Assistant United States Attorney